

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 19-cv-08655 (JHR)

**DECLARATION OF GREGORY S. CHIARELLO IN SUPPORT OF
PLAINTIFF’S OPPOSITION TO GOOGLE’S MOTION FOR
REMITTITUR OF PUNITIVE DAMAGES**

I, Gregory S. Chiarello, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner at Outten & Golden LLP (“O&G”), and counsel for Plaintiff Ulku Rowe in the above-captioned matter. I make this declaration in support of Plaintiff’s Opposition to Google’s Motion for Remittitur of Punitive Damages. I am familiar with the facts discussed herein and attach as exhibits true and correct copies of the documents identified.

2. Attached hereto as Exhibit A are true and correct copies of referenced Court transcript excerpts of the trial proceeding from October 10, 2023 to October 20, 2023.

* * *

I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in New York, New York on December 13, 2023.

Dated: December 13, 2023
New York, New York

Respectfully submitted,
By: /s/ Gregory S. Chiarello

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